



Q & A

CES Environmental Services Inc.
Houston, Texas

Texas Organizing Project, a community-based organization led by working families in Texas, submitted the following questions to the U.S. Environmental Protection Agency (EPA) after an Open House at the Harris County Courthouse in Houston, Texas, December 11, 2014.

Does the CES site pose risk to public health and the environment? The EPA believe that this site poses a risk to public health and the environment and that is the reason EPA is on-scene taking action to remove the hazardous substances located on the site.

What is the EPA's plan for reducing this risk? The EPA's plan for reducing risk to the public is to remove and dispose of the hazardous substances located on the property. The EPA realizes there is potential for both on and off-site contamination associated with spills and runoff from the site. The EPA and/or the TCEQ intend to conduct or have others conduct on and off-site media sampling to determine the extent of any potential contamination and any subsequent cleanup actions that may be necessary.

How will the impacted community be involved in the process? As long as the EPA is involved in the process, the EPA will continue to produce fact sheets and hold information sessions as new information becomes available. This information can also be accessed on our website or by calling our toll-free number 1-800-533-3508, and asking for the Community Involvement Coordinator for the site.

Has the EPA conducted air monitoring? The EPA conducted air sampling and performed air monitoring during the spill that occurred in July/Aug. 2014. The analytical data is posted for review at www.epaosc.net. Air monitoring was performed during

cleanup actions associated with specific cleanup operations. The monitoring consists of the following parameters: Volatile Organic Compounds (VOCs), Hydrogen Sulfide (H₂S), Lower Explosive Limit (LEL), Oxygen (O₂), and Carbon Monoxide (CO).

Have air monitoring stations been set up? No, the EPA has not set up specific air monitoring stations but performs perimeter and operation-specific air monitoring. We are dealing with many volatile compounds and sulfur compounds so detections for VOCs and H₂S are made onsite based upon site-specific operations being conducted. The EPA utilizes an activated carbon unit to vacuum air from our operations to scrub volatile organic compounds and reduce emissions.

What has each monitoring state discovered? The air monitoring focuses on primarily VOCs and H₂S and we have detections for both during the course of the response and will likely continue to have such detections.

Has the EPA conducted soil testing? August 2, 2014, the EPA conducted soil sampling in residential areas including ditches and impacted soil areas during the emergency response action of that date. The EPA recently sent samples to be analyzed for disposal of visibly contaminated soils removed for disposal via roll-off boxes.

Has soil testing been conducted in people's yards? The EPA has only conducted soil sampling in the City Right-of-Way associated with the spill to Kingsbury Street at the end of July 2014. Future soil sampling is anticipated but not associated with the current cleanup action.

What has each sample location shown? The data associated with the sampling event is posted on www.epaosc.net. The results do not show that there is any immediate health risk from the residual material that may have been left behind after the spill cleanup operations.

What health risks are present? Based upon the limited sampling conducted within the drainage ditches, the EPA does not believe there are immediate health risks remaining that are associated with the spill which occurred in July/Aug. 2014.

Has surface or runoff water testing occurred? Yes, the analytical results are posted at www.epaosc.net.

If the water is contaminated, how will it be contained on the site? A dike was installed on the southwest corner of the CES property by the TCEQ and in the City Right-of-Way by the City of Houston to prevent continued runoff to the residential community to the South of the site (Kingsbury). Another dike was installed on the east side of the facility by the Trustee to prevent runoff into residential community along Grace Street.

To a more limited extent, runoff may be occurring at the other areas that border the property. Previously, excess stormwater on the north side of the facility would travel to the stormwater drain at the Griggs/Wayland intersection. The EPA negotiated with the City of Houston to allow discharge of this contaminated stormwater into the sanitary sewer pending cleanup of the potentially contaminated sediments below the accumulated water. The cleanup of these sediments on the northern portion of the property was completed and future releases to the storm drain may be able to resume pending future evaluation. The EPA does not intend on controlling excess rainfall to the property.

Is there a plan for indoor testing of homes, schools, businesses and churches? The EPA has not conducted any indoor testing. The extent of future testing will be determined by the EPA and/or TCEQ. Indoor testing is not anticipated as part of the current cleanup action.

Has the EPA determined the exact contaminants that exist on the CES site? There are a number of contaminants listed in the EPA Action Memorandum, Fact Sheets, and the laboratory data posted on www.epaosc.net.

Which of these contaminants pose a risk to human health and to what extent do they pose a risk? There are a number of contaminants within the containers on the site. The majority of these contaminants are hazardous substances and as such would be hazardous to human health.

What contaminants and how much of each have been removed from the site? Waste quantities removed from the site are as follows; approximately 200,000 gallons of contaminated stormwater, 2 roll-off boxes, 8 or 12 frac tanks, 14 of 23 above ground storage tanks (ASTs), lab chemical, company process samples, and process chemicals disposed by the Trustee.

What contaminants and how much of each remain at the site? The following materials remain to be removed: 3 frac tanks, 9 ASTs with liquids (14 with sludge/residual materials), 19 waste water treatment tanks, visibly contaminated soils/solids, totes, drums, and miscellaneous containers.

Are funds available to remove all the remaining contaminants? We believe that we have sufficient funding to complete the activities barring unforeseen disruptions.

What is the timeline for the removal of the remaining contaminants? The EPA is pushing to complete the cleanup by early spring.

What contaminants are producing the odor? What are the human health risks of exposure to the airborne contaminants? The chemical odors emanating from the site are the result of compromised chemical containers with cresol/phenolic compounds and historic spillage. The odors and potential threats will continue until all waste materials are removed from the site and properly disposed. For more information, please reference the Agency for Toxic Substances and Disease Registry ToxFaq's posted to www.epaosc.net.

When will the contaminants causing the odor be removed from the site? EPA removed the high

concentration cresol/phenol wastes. All of the remaining wastes contain these same cresol/phenol wastes to some degree. Residents will continue to notice these compounds to some degree but the smell should dissipate over time.

There is a temporary earth berm around the site. Is taht berm continuous, intact and will it prevent the escape of contaminants from the site in the event of a major rain event? No, the dike is not continuous and there is no plan to make a continuous dike around the site. Rain-fall on the site is approximately 160,000 to 200,000 gallons/inches of rain. There is no feasible way to handle the volume of water that falls on the site except the way it is currently being managed.

Is the site fully secure from vandalism and is the risk of a future spill negligible at this point? The site is not fully secure but it is substantially more secure since the EPA repaired fences, blocked the entrance to Wayland Street in order to prevent vehicular access to the site. We are working with the Houston Police Department to provide increased surveillance around the facility. We need the residents' assistance in notifying the HPD should they notice unofficial activity at the site.

What is the detailed estimate cost for cleanup and full site remediation? The EPA has authorized funding up to \$2,000,000 to complete the removal of chemicals and visibly contaminated soils along with cleaning up contaminated asphalt/concrete to the extent possible. Additionally, the Texas Commission on Environmental Quality (TCEQ) has committed up to \$500,000 for the same or similar activities to insure these activities are completed.

Where will additional funds come from to complete the cleanup and full site remediation? The EPA is currently evaluating CES business records to determine the parties who sent waste to the CES facility. The EPA will pursue those companies if they are determined to be liable and viable. The TCEQ has a similar process and is moving forward in this process as well. Should these companies not take action, then the EPA/TCEQ will have to move forward with the Superfund Remedial Process.

What cleanup activities remain and how many are unfunded at this time? Potential soil cleanup, debris and trash cleanup, container disposal and scraps still have

Will the EPA oversee future site usage? The EPA has no jurisdiction on future land use. This is primarily a local decision although the state may have some say in this decision as well. Residents must be vigilant with their local representatives and ensure they know their position on the future use of this property.

The site is currently for sale by the bankruptcy trustee. How would a sale affect the EPA's activities? The EPA/TCEQ have a working relationship with the trustee. As a result, the trustee coordinates activities with the EPA/TCEQ.

How would a sale affect the cleanup of the site? A sale would not impact the cleanup activities as EPA and/or TCEQ will require the new owner under Superfund Law to take necessary response actions.

Would a future owner be required to completely cleanup and fully remediate the site and surrounding properties? Yes, that is the normal Superfund process.

Would a future owner be required to engage in a similar line of business to that which CES was permitted to operate? The EPA hopes the City of Houston will listen to the elected officials who represent the residents affected by the CES site and understand their point of view.

What additional oversight, monitoring, licensing, etc., may apply to a new owner's activities on the former CES site? These regulations are controlled by the City of Houston or the State of Texas (TCEQ).

